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Fax: (646) 539-3649  Attorneys for Plaintiff  LYNWOOD INVESTMI  Plainti	NORTHERN DISTRIC	CT OF CALIFORNIA  Case No. 3:20-CV-03778-LHK  DECLARATION OF ALEXANDER D. PENCU IN SUPPORT OF PLAINTIFF'
Fax: (646) 539-3649  Attorneys for Plaintiff  LYNWOOD INVESTMI  Plainti  vs.	NORTHERN DISTRICE ENTS CY LIMITED,  aff,	CT OF CALIFORNIA  Case No. 3:20-CV-03778-LHK  DECLARATION OF ALEXANDER D. PENCU IN SUPPORT OF PLAINTIFF'S SUPPLEMENTAL OPPOSITION TO
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Fax: (646) 539-3649  Attorneys for Plaintiff  LYNWOOD INVESTMI  Plainti  vs.  MAXIM KONOVALOV	NORTHERN DISTRICE ENTS CY LIMITED,  off,  off,  off,  off,  off,	CT OF CALIFORNIA  Case No. 3:20-CV-03778-LHK  DECLARATION OF ALEXANDER D. PENCU IN SUPPORT OF PLAINTIFF' SUPPLEMENTAL OPPOSITION TO DEFENDANTS MAXIM KONOVALOV IGOR SYSOEV, ANDREY ALEXEEV,
Fax: (646) 539-3649  Attorneys for Plaintiff  LYNWOOD INVESTMI  Plainti  vs.	NORTHERN DISTRICE ENTS CY LIMITED,  off,  off,  off,  off,  off,	CT OF CALIFORNIA  Case No. 3:20-CV-03778-LHK  DECLARATION OF ALEXANDER D. PENCU IN SUPPORT OF PLAINTIFF' SUPPLEMENTAL OPPOSITION TO DEFENDANTS MAXIM KONOVALOV IGOR SYSOEV, ANDREY ALEXEEV, MAXIM DOUNIN, GLEB SMIRNOFF,
Fax: (646) 539-3649  Attorneys for Plaintiff  LYNWOOD INVESTMI  Plainti  vs.  MAXIM KONOVALOV	NORTHERN DISTRICE ENTS CY LIMITED,  off,  off,  off,  off,  off,	CT OF CALIFORNIA  Case No. 3:20-CV-03778-LHK  DECLARATION OF ALEXANDER D. PENCU IN SUPPORT OF PLAINTIFF'S SUPPLEMENTAL OPPOSITION TO DEFENDANTS MAXIM KONOVALOV IGOR SYSOEV, ANDREY ALEXEEV, MAXIM DOUNIN, GLEB SMIRNOFF,
Fax: (646) 539-3649  Attorneys for Plaintiff  LYNWOOD INVESTMI  Plainti  vs.  MAXIM KONOVALOV	NORTHERN DISTRICE ENTS CY LIMITED,  off,  off,  off,  off,  off,	CT OF CALIFORNIA  Case No. 3:20-CV-03778-LHK  DECLARATION OF ALEXANDER D. PENCU IN SUPPORT OF PLAINTIFF'S SUPPLEMENTAL OPPOSITION TO DEFENDANTS MAXIM KONOVALOV IGOR SYSOEV, ANDREY ALEXEEV, MAXIM DOUNIN, GLEB SMIRNOFF, AND ANGUS ROBERTSON'S MOTION

ROBERTSON'S MOTION FOR ATTORNEYS' FEES (ECF 174), Case No. 3:20-CV-03778-MMC

I, Alexander D. Pencu, declare under penalty of perjury as follows:

- 1. I am a partner of Meister Seelig & Fein PLLC, one of the attorneys for Plaintiff, Hemma Investments CY Limited f/k/a Lynwood Investments CY Limited ("Lynwood"), and I am admitted *Pro Hac Vice* in the above-captioned action. I am duly authorized and licensed to practice law before all courts in the State of New York and the State of Connecticut, the Southern and Eastern District Courts of New York, and the District of Connecticut. I submit this declaration in support of Lynwood's supplemental opposition to Defendants Maxim Konovalov, Igor Sysoev, Andrey Alexeev, Maxim Dounin, Gleb Smirnoff, and Angus Robertson's (together the "Individual Defendants") Motion for Attorneys' Fees (ECF 174) (the "Motion").
- 2. On December 20, 2022, the Court ordered Individual Defendants to submit contemporaneous time records, finding that "absent submission of contemporaneous time records, the Court is unable to determine the appropriate amount of attorneys' fees to be awarded." (ECF 184, pp. 14-15).
- 3. On January 17, 2023, Individual Defendants submitted their supplemental submission regarding amount of attorneys' fees (ECF 185) and Declaration of Bruce W. Baber (ECF 185-1) attaching Exhibits A to T, which Individual Defendants submit are chronological invoices that include all fees requested by Individual Defendants.
- 4. Upon receipt, Lynwood reviewed Individual Defendants' time records to respond to Individual Defendants' supplemental submission. Lynwood opposes Individual Defendants' fee motion in its entirety. In further support of its opposition Lynwood identified several categories of fees identified on Individual Defendants' time records that Lynwood contends are improper and should be excluded from any fee award. For the Court's convenience, Lynwood submits the following exhibits which contain relevant excerpts from Individual Defendants' chronological invoices.
- 5. Attached hereto as **Exhibit A** is an excerpted collection from Individual Defendants' time records containing all time entries entered by King & Spalding attorney Bruce W. Baber.

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1	6. Attached hereto as <b>Exhibit B</b> is an excerpted collection from Individual Defendants'
2	time records containing time entries that Lynwood is challenging as improper block-billed time
3	entries.
4	7. Attached hereto as <b>Exhibit C</b> is an excerpted collection from Individual Defendants'
5	time records containing time entries that Lynwood is challenging for improper redactions.
6	8. Attached hereto as <b>Exhibit D</b> is an excerpted collection from Individual Defendants'
7	time records containing time entries that Lynwood is challenging as impermissibly vague.
8	9. Attached hereto as <b>Exhibit E</b> is an excerpted collection from Individual Defendants'
9	time records containing all time entries entered by King & Spalding attorney Quyen L. Ta.
10	I declare under penalty of perjury that the foregoing is true and correct.
11	Executed this 7th day of February 2023 in Stamford, Connecticut.
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